

EXHIBIT D

LAW OFFICE OF GARY GREENBERG, ESQ.

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December 6, 2021

By Email

Samuel J. Rubin, Esq.
Goodwin Proctor LLP
The New York Times Building
620 Eighth Avenue
New York, NY 10018

RE: *Rohan Ramchandani v. Citigroup, Inc., et al.*,
Civil Action No. 1:19-cv-9124(VM) (SDA)

Dear Sam:

In accordance with our agreement, and as reflected in our Joint Letter to the Magistrate filed November 24, 2021 in which we “undertook to, by December 6, 2021, propose a list of Citi affiliated custodians whose electronic files should be searched, as well as the search terms to be employed in conducting those searches.”

First, we designate the following Citi affiliated custodians for electronic records searches:

Danielle Romero Apsilos
Michael Corbat
Lev Dassin
Jeff Feig
Paul Ferguson
James Forese
Jeff French
Jonathan Kolodner
Mei Linn Kwan Gett
Elaine Mandelbaum
Mark Nelson
Anil Prasad
Rohan Ramchandani
Edward Skyler
Rohan Weerasinghe
Paco Ybaraa

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Second, we designate the following search terms:

A. Search terms Citi employed in searching the email and/or other accounts of certain FX Spot market-related personnel for production to the DOJ, including, the terms listed in the email dated October 13, 2013 (Citi-RR-00324290); and

B. The following additional terms, to the extent not included in the first category:

“Anthony John” or “Tony John”

Antitrust

Ashton

Bakri

Brides

Cave

“Chat Room*”

Cheat*

Competition, Comp*

Cummins

“DG Comp*, “Directorate General for Competition”

DOJ, (“Dep’t of Justice”, “Dept of Justice,” “Department of Justice”)

ECB*, “European Central Bank”

EU, “European Commission”

FCA, “Financial Conduct Authority”

Fix*

“Foreign Exchange;” “For* Ex*”

Forex

Fraud*

FX

Gibbinson

Guilty

Hoodless

Immun*

Lawes

Libor

Madaras

Manipulat*

McWilliams

Plea

Prosecut*

Rig*

Santos

SFO*, “Serious Fraud Office”

“Spot market”

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Spread*
“Stand Down”
Stimpson
Thong
Tschachtli
WMR

(“*” is a root expander)

Finally, we are seeking all responsive documents located from the foregoing searches of electronic records concerning, as well as all FX Spot market related correspondence with, the following agencies (but, not at this time, the document productions to such agencies):

1. Every agency and non-governmental entity in the United States that conducted an FX Spot market investigation or made inquiries with respect thereto, including, but not limited to, the Controller of the Currency, Commodities Future Trading Commission and the Securities and Exchange Commission.
2. Every agency and non-governmental entity in the UK that conducted an FX Spot market investigation or made inquiries with respect thereto, including, but not limited to, the Financial Conduct Authority and the Serious Fraud Office.
3. Every European Union related agency and non-governmental entity that conducted an FX Spot market investigation or made inquiries with respect thereto, including, but not limited to, the EU Directorate General for Competition and the European Central Bank.
4. Every agency and non-governmental entity in Switzerland, Brazil and South Africa that conducted an FX Spot market investigation or made inquiries with respect thereto.

If you have any suggestions that would make your search more efficient or productive, we would be happy to discuss.

We look forward to hearing from you.

Sincerely,



Gary Greenberg